

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

SEP 23 2021

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RICHLAND, WASHINGTON

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9 UNITED STATES DISTRICT COURT
10 FOR THE EASTERN DISTRICT OF WASHINGTON

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 TRENT DREXEL HOWARD,

15 Defendant.

Case No. 4:19-CR-06036-SMJ

INFORMATION SUPERSEDING
INDICTMENT

Vio: 18 U.S.C. § 2251(a), (e)
Attempted Production of Child
Pornography

18 U.S.C. § 2253
Forfeiture Allegations

16 The United States Attorney charges:

17 Beginning on an unknown date, but at least by on or about March 2008 and
18 continuing through on or about June 5, 2019, in the Eastern District of
19 Washington, the Defendant, TRENT DREXEL HOWARD, did knowingly attempt
20 to use a minor child: Minor 1, Minor 2, Minor 3, Minor 4, Minor 5, Minor 6,
21 Minor 7, Minor 8, Minor 9, Minor 10, Minor 11, Minor 12, Minor 13, and Minor
22 14, to engage in sexually explicit conduct, for the purpose of producing any visual
23 depiction of such conduct, knowing and having reason to know that such visual
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1 depiction would be transported and transmitted, using any means and facility of
2 interstate and foreign commerce, and in and affecting interstate and foreign
3 commerce; such visual depiction to be produced and transmitted using materials
4 that had been mailed, shipped and transported in and affecting interstate and
5 foreign commerce; and such visual depiction actually transported and transmitted,
6 using any means and facility of interstate and foreign commerce, and in and
7 affecting interstate and foreign commerce by any means, including by computer, in
8 violation of 18 U.S.C. § 2251(a), (e).
9

12 NOTICE OF FORFEITURE ALLEGATIONS

13 The allegations contained in this Indictment are hereby realleged and
14 incorporated by reference for the purpose of alleging forfeitures.
15

16 Pursuant to 18 U.S.C. § 2253, upon conviction of an offense(s) in violation
17 of 18 U.S.C. § 2251(a), (e), as alleged in this Information Superseding Indictment,
18 the Defendant, TRENT DREXEL HOWARD, shall forfeit to the United States any
19 visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260,
20 or any book, magazine, periodical, film, videotape, or other matter which contains
21 any such visual depiction, which was produced, transported, mailed, shipped or
22 received in violation of this chapter; any property, real or personal, constituting or
23 traceable to gross profits or other proceeds obtained from such offenses; and, any
24 property, real or personal, used or intended to be used to commit or to promote the
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1 commission of such offenses, or any property traceable to such property, including,
2 but not limited to:

- 3
- 4 - Camcorder, Sony, Model: CCD-TRV68, S/N: 180450;
- 5 - External HDD Western Digital Model: WDBACX0010BBL, S/N:
- 6 WXH1E61FVHJ7, 1TB;
- 7 - External HDD Toshiba Model: HDTC610XK3B1, S/N:
- 8 Y2DVTNHT0TSX3, 1TB;
- 9 - External HDD Western Digital Model: WDBGPU0010BBK, S/N:
- 10 WXD1EA0HM853, 1TB;
- 11 - External HDD Western Digital Model: WDBGPU0010BBK, S/N:
- 12 WXB1E2568KSJ, 1TB;
- 13 - External HDD Western Digital Model: WDBBEP0010BS, S/N:
- 14 WX71E33ZMF14, 1TB;
- 15 - Dane-Elec red flash drive, 4GB;
- 16 - Two wireless cameras with no data storage capacity;
- 17 - Smoke alarm with pin camera, no storage;
- 18 - MicroSD card, Make: Patriot, 16GB;
- 19 - MicroSD card, Make: Kingston, 32GB;
- 20 - External HDD, Western Digital Model: WDBACYL5000ABK, S/N:
- 21 WXE1E11MUX21, 500 GB;
- 22 - External HDD, Western Digital Model: WDBKXH5000ABL, S/N:
- 23 WXE1E13ZWT26, 500 GB;
- 24 - MicroSD card, 8GB;
- 25 - MicroSD card, Make PNY, 8GB;
- 26 - MicroSD card, Make: SanDisk, 8GB;
- 27 - MicroSD card, Make: SanDisk, 8GB;
- 28 - MicroSD card, Make: SanDisk, 8GB;

- MicroSD card, Make: Transcend, 2GB;
- HDD Western Digital Model: WD1600BEVE, S/N: WXC608A71190, 160 GB;
- HDD, Western Digital, Model: WD400EB-00CPF0, S/N: WCAATE714122, 40 GB;
- HDD, Hitachi, Model: HDT725032VLA380, S/N: VFJ200R80DSZWX, 320 GB.

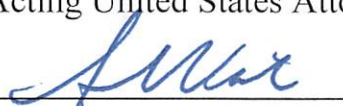
If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b).

DATED this 23rd day of September, 2021.

Joseph H. Harrington
Acting United States Attorney


Ann T. Wick
Assistant United States Attorney